



NSF-ISR, LTD
SURVEILLANCE AUDIT REPORT

A. Program Participant's Name: Wisconsin County Forest Program, FRS 1Y943

B. Operation(s) within the scope of SFIS Surveillance Audit:

Sustainable forestry activities of participating counties within the Wisconsin County Forest System and land management operations in selected Wisconsin County Forests including 25 counties encompassing approximately 2,180,384 acres of publicly owned forests, including the following counties: Ashland, Barron, Bayfield, Burnett, Douglas, Eau Claire, Florence, Forest, Iron, Jackson, Juneau, Langlade, Lincoln, Marathon, Marinette, Oconto, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn, Wood.

C. NSF Audit Team:

Lead Auditor: Michael Ferrucci

Auditor: Dave Wager

D. Audit Date(s): February 6-9, 2006

E. Scope:

☐ No Change

☒ Changed (see Section H, revised scope statement noted on FRS)

F. Reference Documentation:

2005-2009 SFI Standard®

G. Audit Results: Based on the results at this visit, the auditor concluded

☐ Acceptable with no nonconformances; or

☒ Acceptable with minor nonconformances that should be corrected before the next regularly scheduled surveillance visit;

☐ Not acceptable with one or two major nonconformances - corrective action required;

☐ Several major nonconformances - certification may be canceled unless immediate action is taken

Company Representative: _____ Date: _____

NSF-ISR Representative: _____ Date: _____

This acknowledges the NSF-ISR Audit Team's visit to this location and the SFI Program Participant's receipt of this report and one new Corrective Action Request (CAR) form.

H. Changes to Operations or to the SFI Standard

Are there any significant changes in operations, procedures, specifications, FRS, etc. from the previous visit? ☒ Yes ☐ No

If yes, provide details of the changes:

The program has adopted the 2005-2009 Sustainable Forestry Initiative Standard® .

The scope of lands is now 2,180,384 acres.

I. Corrective Action Requests: (see Appendix IV)

Correct Action Requests Issued this visit: MF-2006-1 Training

☐ Corrective Action Plan is not required.

☒ Corrective Action Plan is required within sixty days of this visit (for Minor Nonconformances). CARs will be verified during the next Surveillance Audit.

☐ Corrective Action Plan is required within thirty days of this visit (for Major Nonconformances). All major nonconformance(s) must be closed by the auditor prior to the next scheduled surveillance audit by a special verification visit or by desk review, if possible. The auditor will make arrangements to verify the corrective action has been effectively implemented.

Any Corrective Action Plans should be mailed to:

Mike Ferrucci, SFI Lead Auditor,

26 Commerce Drive, North Branford, CT 06471

At the conclusion of this Surveillance Audit visit, the following number of CARs remain open:

MAJOR(S) : None

MINOR(S): One

In addition, Five Opportunities For Improvement (OFIs) were identified.

Appendices:

Appendix I: Surveillance Audit Schedule and Notification Letter

Appendix II: Agreement to Not Consult and to Not Disclose

Appendix III: Attendance Sheets

Appendix IV: Corrective Action Requests

Appendix V: Summary Surveillance Audit Report

Appendix VI: Audit Matrix

APPENDIX I



Surveillance Notification Letter and Audit Schedule



January 10, 2006

Jeff Barkley, County Forest Program Specialist
Bureau of Forest Management
WI Department of Natural Resources
PO Box 7921, Madison, WI 53707-7921

Re: Confirmation of SFI and FSC Surveillance Audits, Wisconsin County Forest System

Dear Mr. Barkley:

We are scheduled to conduct the Annual Surveillance Audits of the Wisconsin County Forest System on February 6-9, 2005 as follows:

County	Date and Times		Program
Bayfield	Monday, Feb. 6	8 am to 5 pm	SFI Only
Price	Tuesday, Feb. 7	8 am to 5 pm	FSC and SFI
Iron	Wednesday, Feb. 8	8 am to 5 pm	FSC and SFI
Ashland	Thursday, Feb. 6	7 am to 2 pm	FSC and SFI

This is a partial review of your SFI and FSC Programs to confirm that they continue to be in conformance with the requirements and that progress is being made in closing your CARs. The audit team will consist of Mike Ferrucci, NSF-ISR Lead Auditor and Dave Wager, SCS Lead auditor. During the audit we will focus on the following:

SFI Program:

- Review progress on achieving SFI objectives and performance measures and the results of the management review of your SFI Program;
- Review selected components of your SFI program;
- Verify effective implementation of any corrective action plans from the previous NSF audit; and
- Evaluate the effectiveness of planned activities aimed at continual improvement of your SFI Program.

FSC Program:

- A focused assessment of the status of outstanding corrective action requests
- Assess selected county forests against a portion of the FSC Lake States Standard. Counties will be assessed against Criteria and Indicators of the standard where non-conformances were observed in the original assessment, as well as other Criteria and Indicators, as determined by the SCS auditor.
- Review of any changes within DNR or enrolled Counties (e.g., staffing, land acquisitions, planning documents) that are pertinent to the certification.

Logistics

- As during the certification audit we should plan to have lunch on site to expedite the visit.
- You have agreed to make motel reservations in Ashland for both lead auditors, who will pay for their own rooms when we arrive.
- We will travel in your vehicle(s) during the audit, but have our own transportation to and from the Duluth airport.
- Dave and I will need snowshoes and hardhats.

Field Site Selections

As discussed, you will provide a list of sales that were established, sold, or closed during 2004 or 2005. We will select an initial subset of about 60 sales and will ask for additional information on these sales, including their accessibility, the likelihood of being actively harvested during the visit, and their locations on county maps. Once we receive this information we will select 12 sites for Iron and Price and 8 sites for Ashland and Bayfield counties that we may visit.

Documentation Requested

When we arrive each day please provide documentation (2 sets) for the selected sites similar to that provided for the certification audit (maps, project descriptions, and contracts). We would also need copies of the draft management plans and any other information that would help us determine conformance to the certification requirements.

The enclosed tentative schedule should be reviewed by all participants. This schedule can be adapted either in advance or on-site to accommodate any special circumstances.

If you have any questions regarding this planned audit, please contact either of us.

Sincerely yours,

Mike Ferrucci
SFI Program Manager, NSF-ISR
26 Commerce Drive
North Branford, CT 06471
mferrucci@iforest.com
Office and Mobile: 203-887-9248

Dave Wager
Director -Forest Management Certification SCS
6107 Skyview Drive
Missoula, Montana 59803
dwager@scscertified.com
Phone: 406-251-7049
Mobile: 510-708-0397

Enclosure: Draft Agenda for Surveillance Audit

DRAFT Agenda for 2006 Surveillance Audit

Bayfield County Monday, February 6 8 am to 5 pm SFI Only

<i>Time</i>	<i>Activity</i>
7:45 am	Arrive County Forestry Offices
8:00 am	Opening Meeting and Office Discussions Discuss SFI CARs Overview of Bayfield County Forest Management Program
10:00 am	Review Selected Sales and Finalize Field Visit
10:30 – 4 pm	Field Site Visits
4-5 pm	Daily Briefing (office)

Price County Tuesday, February 7 8 am to 5 pm FSC and SFI

<i>Time</i>	<i>Activity</i>
7:45 am	Arrive County Forestry Offices
8:00 am	Opening Meeting and Office Discussions Discuss FSC CARs Overview of Price County Forest Management Program
10:00 am	Review Selected Sales and Finalize Field Visit
10:30 – 4 pm	Field Site Visits
4-5 pm	Daily Briefing (office)

Iron County Wednesday, February 8 8 am to 5 pm FSC and SFI

<i>Time</i>	<i>Activity</i>
7:45 am	Arrive County Forestry Offices
8:00 am	Opening Meeting and Office Discussions Discuss Hardwood Management CAR
9:00 am	Review Selected Sales and Finalize Field Visit
9:30 – 4 pm	Field Site Visits
4-5 pm	Daily Briefing (office)

Ashland County Thursday, February 9 7 am to 2 pm FSC and SFI

<i>Time</i>	<i>Activity</i>
7:00 am	Arrive County Forestry Offices
7:15 am	Opening Meeting and Office Discussions Overview of Ashland County Forest Management Program
8:15 am	Review Selected Sales and Finalize Field Visit
8:30 – 12:30	Field Site Visits
12:30 – 1 pm	Auditor private discussion (lunch and meeting space needed)
1-2 pm	Final Exit Briefing (office)

APPENDIX II



Agreement to Not Consult and to Not Disclose

AGREEMENT TO NOT DISCLOSE AND TO NOT CONSULT

IN CONSIDERATION of my appointment to represent NSF International Strategic Registrations, Ltd. (NSF-ISR) and conduct management systems audits of the documentation, operations, and facilities of:

Wisconsin County Forest System and WI Department of Natural Resources Bureau of Forest Management
PO Box 7921, Madison, WI 53707-7921

(hereinafter called "NSF-ISR's Client") for registration by NSF-ISR, I agree as follows:

1. I will not at any time during or subsequent to this agreement disclose or use in any way any information or knowledge or data I receive or develop while providing service for NSF-ISR, including but not limited to, plans, lists, prospects lists, and trade secrets of NSF-ISR or its client.
2. While representing NSF-ISR, I may have access to confidential business information from NSF-ISR's client and others, and may be authorized to handle this information in the performance of my responsibilities. I can assume that this is proprietary information to the client or parties supplying it, and agree it may not be revealed by me to others outside NSF-ISR. I agree to maintain this information in a secure manner that prevents any accidental disclosure. Unauthorized disclosure or handling of confidential business information may result in disciplinary action, including but not limited to cancellation of my appointment to represent NSF-ISR. Should my authorization to handle confidential information be revoked while I am appointed to represent NSF-ISR, or as a result of cancellation of my appointment to represent NSF-ISR, I understand that my obligation not to reveal confidential business information will still be in force.
3. Upon cancellation of my appointment to represent NSF-ISR for any reason, I agree to promptly deliver to NSF-ISR all physical property, plans, designs, computer programs, computer lists, prospect lists, records, letters, notes, reports, and all other materials relating to NSF-ISR or its client in my possession or under my control.
4. I hereby attest that I have not provided consultation or other services related to the SFI program or management system to NSF-ISR's client for at least two years, and to preclude any actual or perceived conflict of interest, I agree to not enter into any agreement, provide consultation or other services to NSF-ISR's client (for whom I participated in any audit) except for services under this agreement, for a period of two years after completion of services under this agreement. Certification or auditing under a recognized standard is not subject to the above prohibitions.
5. I shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. I shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. I shall disclose to the party requesting this audit any prior land appraisal or assessment work or land brokerage activity I or my employers has conducted related to the property to be audited.

Signature

Michael Ferrucci February 6, 2005

AGREEMENT TO NOT DISCLOSE AND TO NOT CONSULT

IN CONSIDERATION of my appointment to represent NSF International Strategic Registrations, Ltd. (NSF-ISR) and conduct management systems audits of the documentation, operations, and facilities of:

Wisconsin County Forest System and WI Department of Natural Resources Bureau of Forest Management
PO Box 7921, Madison, WI 53707-7921

(hereinafter called "NSF-ISR's Client") for registration by NSF-ISR, I agree as follows:

1. I will not at any time during or subsequent to this agreement disclose or use in any way any information or knowledge or data I receive or develop while providing service for NSF-ISR, including but not limited to, plans, lists, prospects lists, and trade secrets of NSF-ISR or its client.
2. While representing NSF-ISR, I may have access to confidential business information from NSF-ISR's client and others, and may be authorized to handle this information in the performance of my responsibilities. I can assume that this is proprietary information to the client or parties supplying it, and agree it may not be revealed by me to others outside NSF-ISR. I agree to maintain this information in a secure manner that prevents any accidental disclosure. Unauthorized disclosure or handling of confidential business information may result in disciplinary action, including but not limited to cancellation of my appointment to represent NSF-ISR. Should my authorization to handle confidential information be revoked while I am appointed to represent NSF-ISR, or as a result of cancellation of my appointment to represent NSF-ISR, I understand that my obligation not to reveal confidential business information will still be in force.
3. Upon cancellation of my appointment to represent NSF-ISR for any reason, I agree to promptly deliver to NSF-ISR all physical property, plans, designs, computer programs, computer lists, prospect lists, records, letters, notes, reports, and all other materials relating to NSF-ISR or its client in my possession or under my control.
4. I hereby attest that I have not provided consultation or other services related to the SFI program or management system to NSF-ISR's client for at least two years, and to preclude any actual or perceived conflict of interest, I agree to not enter into any agreement, provide consultation or other services to NSF-ISR's client (for whom I participated in any audit) except for services under this agreement, for a period of two years after completion of services under this agreement. Certification or auditing under a recognized standard is not subject to the above prohibitions.
5. I shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. I shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. I shall disclose to the party requesting this audit any prior land appraisal or assessment work or land brokerage activity I or my employers has conducted related to the property to be audited.

Signature

Dave Wager February 6, 2005

APPENDIX III



Attendees

Opening Meeting and Field Session

Bayfield County Monday February 6, 2006

Mike Ferrucci	NSF-ISR, SFI Lead Auditor, FSC Auditor
Jeff Barkley	DNR County Forest Specialist
Todd Naas	DNR Wildlife Biologist
Tim Davis	DNR Liaison Forester
Neil Paulson	County Board
Paul Lundberg	County Forest Administrator
Steve Probst	Assistant Forest Administrator
Kirby Dernovsek	Bayfield County Forester
Mike Amman	Bayfield County Forester
Jason Bodine	Bayfield County Forester
Jan Blakeley	Bayfield County Officer Manager
John Mesko	Bayfield County Forestry Technician

Price County Tuesday February 7, 2006

Mike Ferrucci	NSF-ISR, SFI Lead Auditor, FSC Auditor
Dave Wager	SCS, FSC Lead Auditor, SFI Auditor
Pete Bartelt	Forest & Parks Administrator, Price County
Eric Holm	Assistant Forest Administrator, Price County
Kyle Schmidt	Forester I, Price County
Jeff Barkley	DNR County Forest Specialist
Pat Beringer	DNR Wildlife Biologist
Greg Mitchell	DNR Price/Taylor Team Leader/ Acting Liaison Forester
Nick Koltz	DNR Liaison Forester, Sawyer County
Greg Peterson	Forest Administrator, Sawyer County

Iron County Wednesday February 8, 2006

Mike Ferrucci	NSF-ISR, SFI Lead Auditor, FSC Auditor
Dave Wager	SCS, FSC Lead Auditor, SFI Auditor
C.E. Zinsmaster	Forest Administrator, Iron County
Gary Glonek	Forester, Iron County
Clyde Berglund	Iron County Forestry Committee
Donald D. Richards	Iron County Forestry Committee

Tom Thompson	Iron County Forestry Committee
Jodie Bednar-Clemens	Iron County Corporation Counsel
Bruce Bacon	DNR Wildlife Biologist
Jim Warren	DNR Chief, Forest Lands
Jeff Barkley	DNR County Forest Specialist
Carmen Wagner	DNR Forest Hydrologist
Paul Pingrey	DNR Forest Certification Specialist
Mike Luedeke	DNR Spooner
Tom Salzmann	DNR Lake Superior Area Forestry Leader
Darryl Fenner	DNR Team Leader
Kelly O'Neil	DNR Liaison Forester
Joe Schmidt	DNR Forester , Upson
Chris Niehaus	DNR Forester , Mercer
Heather Berklund	DNR Forester , Mercer
Tim Fitzgerald	DNR Forester/Ranger , Mercer

Ashland County Thursday February 9, 2006

Mike Ferrucci	NSF-ISR, SFI Lead Auditor, FSC Auditor
Dave Wager	SCS, FSC Lead Auditor, SFI Auditor
Jim Warren	DNR Chief, Forest Lands
Jeff Barkley	DNR County Forest Specialist
Tom Duke	DNR Forestry Staff
Mike Luedeke	DNR Spooner
Darryl Fenner	DNR Team Leader
Tom Piikkila	DNR Liaison Forester
Bruce Bacon	DNR Wildlife Biologist
Chris Hoffman	Forest Administrator, Ashland County
Matt Hansen	Forester, Ashland County
Peter Anderson	DNR Forestry Technician, Mellen

Closing Meeting:

DNR Ashland Office Thursday February 9, 2006

Mike Ferrucci	NSF-ISR, SFI Lead Auditor, FSC Auditor
Dave Wager	SCS, FSC Lead Auditor, SFI Auditor
Jim Warren	DNR Chief, Forest Lands
Jeff Barkley	DNR County Forest Specialist
Todd Naas	DNR Wildlife Biologist
Mike Luedeke	DNR Spooner
Tom Duke	DNR Forestry Staff
Tom Salzmann	DNR Lake Superior Area Forestry Leader
Al Tatzel	DNR Area Forestry Specialist
Darryl Fenner	DNR Team Leader
Tim Davis	DNR Liaison Forester, Bayfield
Tom Piikkila	DNR Liaison Forester, Ashland
Pete Bartelt	Forest & Parks Administrator, Price County
Chris Hoffman	Forest Administrator, Ashland County
Matt Hansen	Forester, Ashland County
Peter Anderson	DNR Forestry Technician, Mellen
Paul Lundberg	County Forest Administrator, Bayfield
Steve Probst	Assistant Forest Administrator, Bayfield
Mark Abeles-Allison	Administrator, Bayfield

APPENDIX IV



Corrective Action Requests

Corrective and Preventive Action Request (CAR)

Company/Location: <u>Wisconsin County Forest System</u> Auditor: <u>Michael Ferrucci</u> Location of Finding: <u>Price, Ashland Counties</u> Discussed with: <u>Jeff Barkley, County Forestry Specialist</u>	Date: <u>February 9, 2006</u> FRS # <u>1Y943</u> CAR Number: <u>MF-2006-1</u> Previous CAR Number/Date: <u>none</u> Nonconformance Type (underline): Major <u>Minor</u>
AUDITOR FINDING: Standard Number and Clause: <u>SFI Indicator 10.1.4 Contractor education and training sufficient to their roles and responsibilities</u> Description: <u>Although all three loggers interviewed have FISTA (SIC SFI Approved) training, not all counties have incorporated contractor training into their timber sale requirements.</u>	
IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS: 1) ROOT CAUSE ANALYSIS BY COMPANY —Include potential causes & assurance problem does not exist in other areas. <u>Use of trained contractors has long been encouraged on the county forests. When originally SFI-certified in 2004, the County Forest program was evaluated under the 2002-04 SFI standard which only required training to that level. Changes to the 2005-09 SFI standard now require appropriate training. The Wisconsin County Forest Certification / Legislative committee has acknowledged the new requirement and has distributed the recommended plan of action to all member counties (completed in summer of 2005). Wisconsin DNR implemented the requirement effective 1/1/2006. Member counties are still in the process of implementing the requirement.</u>	
2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date. <u>a) At the March 2006 Spring County Forest Administrators meeting a recap of the 2006 surveillance audit will be presented and the need to follow through on the previously distributed process will be communicated.</u> <u>b) During the approval phase of the individual County Forest Comprehensive Land Use plans (occurring in 2005) the DNR will ensure that language requiring contractor training is included.</u>	
3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date. <u>WDNR (and County Boards) approve the County Forest Comprehensive Land Use plans that are required by statute (28.11) and serve as the framework for all management on each forest. In addition, any amendments to this plan require DNR and County Board approval. The initial approval of the plans and any subsequent amendments will continue to ensure that member counties include the appropriate training for their contractors.</u>	
AUDITOR REVIEW OF COMPANY'S PLAN: <u>The plan as outlined above is appropriate and should serve to close the non-conformance.</u>	
STATUS: <u>OPEN</u> AUDITOR/DATE: <u>Mike Ferrucci 2-27-06</u>	
AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION: STATUS: _____ AUDITOR/DATE: _____	

LEGEND: OPEN=CA Plan Accepted CLOSED=CA implemented, verified & accepted REJECTED=CA Plan or Implementation rejected

Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR County Forest Program</u>	Date: <u>October 5, 2004</u> FRS # 1Y943
Auditor: <u>Mike Ferrucci, NSF-ISR</u>	Finding Number: <u>CA-2004-2</u>
Location of Finding: _____	CAR Number: <u>CA-2004-2</u>
Discussed with: <u>Jeff Barkley, County Forestry Specialist</u>	Previous CAR Number/Date: _____

AUDITOR FINDING: Standard Number and Clause: 2002-2004 SFIS: 4.1.2.1.4 Program Participants shall implement management practices to protect and maintain forest and soil productivity. CI 6 Field observations indicate that, where practicing partial harvesting, vigorous trees are retained consistent with silvicultural norms for the area. On several sites visited in one forest, silviculture guidelines for northern hardwoods were not being followed. Although uneven-aged management was specified and basal area was maintained above 70 square feet per acre, there was limited effort to maintain larger trees or to remove smaller trees to attain targeted diameter distributions. The most vigorous trees were often targeted for removal.

Major Nonconformity Minor Nonconformity

Company Representative's Signature: Note: Signed copy on file at NSF

IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**1) ROOT CAUSE ANALYSIS BY COMPANY** – Include potential causes and assurance that problem does not exist in other areas.

While we do not contest the auditor's findings or their significance, we feel the findings are isolated with respect to the County Forest program. This non-conformance was not an issue in any of the other field visits conducted during the audit. In this particular County, deviations from the accepted northern hardwood silvicultural guidelines have long been a source of conflict between one particular County Forester and DNR Foresters working on the Forest.

2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

a) Effective immediately, the County Forest Administrator will convene with the Forester in question to provide solid direction to mark within the silvicultural guidelines. Northern hardwood marking needs to improve the stand quality, create canopy gaps to develop/release regeneration and remove poor quality, at risk trees. There will be an increased focus on marking overstocked hardwood pole stands as well.

b) Effective immediately, County / DNR staff will collect field data on sales already closed-out to gain a better understanding of the ramifications of different marking schemes. The data will be fed into LS-TWIGS FVS model

c) WDNR, in its oversight role, will not approve timber sales falling outside the parameters of the Silvicultural Hbk. unless an experimental silvicultural trial has been agreed to.

3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

Effective immediately, internal monitoring of timber sales will occur whereby a County Forester (typically the Forest Administrator) and a DNR Forester will jointly field review all timber sales for compliance with the silvicultural guidelines as well as other aspects of timber sale setup and design.

By June 30, 2005 there will be consultation and a field evaluation by the DNR's Forest Silviculturist to provide insight into the sideboards of the Northern Hardwood chapter in the Silvicultural handbook.

Within the next 2 years, opportunities for ongoing training in Northern Hardwood management will be made available to DNR and County staff.

Company Representative's Signature: Note: Signed copy on file at NSF _____ Date: _____

AUDITOR REVIEW OF COMPANY'S PLAN:

Comments: The proposed actions appear to represent a good plan to close the specific non-conformance, as well as a blueprint for significant progress on the larger and very complex issue of managing tolerant hardwood stands at a time when practices in this area are changing based on new information from research and experience.

STATUS: Approved

AUDITOR/DATE: Mike Ferrucci, 12/03/04

AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:

Comments: (The relevant requirement is now found in Indicator 2.3.5 "Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area." Please be prepared to brief me on progress made towards completing your corrective action plan. We may keep this open until we have an opportunity to make a field review of marked and completed Northern hardwood harvests in the district where the issue arose. March 2005)

Review of documents, interviews, and field observations confirmed that the corrective action plan has been implemented in Iron County. Review of hardwood sales in other counties confirmed that this problem does not exist in other areas.

STATUS: CLOSED

AUDITOR/DATE: Michael Ferrucci, 02-08-06

LEGEND: OPEN=CA Plan Accepted **CLOSED**=CA implemented, verified & accepted **REJECTED**=CA Plan or Implementation rejected

Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR County Forest Program</u>	Date: <u>October 5, 2004</u> FRS # 1Y943
Auditor: <u>Mike Ferrucci, NSF-ISR</u>	Finding Number: <u>CA-2004-3</u>
Location of Finding: _____	CAR Number: <u>CA-2204-3</u>
Discussed with: <u>Jeff Barkley, County Forestry Specialist</u>	Previous CAR Number/Date: _____

AUDITOR FINDING: Standard Number and Clause: 2002-2004 SFIS: 4.1.3.1.1 Program Participants shall meet or exceed Best Management Practices...; CI 2 Field Staff and contractors trained in water quality laws and state BMPs; CI 5 Contract provisions specify BMP compliance CI 2: Not all road building / road maintenance personnel have received BMP training. Training records for county staff are not complete in some cases, making it difficult for managers to be certain that all field staff are trained. New foresters may not have received adequate formal BMP training in school, and some delay may occur before they receive BMP training while employed. CI 5: Confirmed in contracts in 6 of 7 county forests visited. Where not specified in contract the programs clearly do include BMPs in design of projects, and have provisions for some BMP issues.

Major Nonconformity **Minor Nonconformity**

Company Representative's Signature: Note: Signed copy on file at NSF

IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY – Include potential causes and assurance that problem does not exist in other areas.

To this point in time BMP's have been voluntary guidelines in Wisconsin. County Forests have routinely made them a part of forest management projects and referenced them in the long range County Forest plans. Many have formalized their acceptance by including them in their timber sale contracts. *Application of BMPs on projects has been evaluated and reviewed but WDNR, in its oversight role, has no statutory authority to require BMP training of County Forest staff. Similarly, WDNR has not required training records be kept at the County Forest level. A variety of training opportunities have been made available for both WDNR and County Forest staff. Participation of some counties has been limited by costs incurred and perceived lack of value from the local County Forest committee and /or Forest administrator.*

2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

a) The WDNR Division of Forestry has made contact with the Forest Industry Safety Training Alliance (FISTA) to contract BMP training for DNR and County Forest staff. This training will be made available by Dec. 31, 2005. The importance of training all staff, including those involved in road / trail construction, will be communicated to the counties.

b) By July 2005, a section in the County Forest Plan template will be added that addresses the importance of training and the maintenance of training records for County Forest staff. The format of the training records will be left to the individual counties discretion.

3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

WDNR will include an assessment of the training and training records for County Forest staff as part of the internal SFI monitoring that will be built into the regular County Forest audits (3 yr. intervals) as well as at the annual County Forest / DNR partnership meeting. This will be completed by July of 2006.

Company Representative's Signature: Note: Signed copy on file at NSF _____ Date: _____

AUDITOR REVIEW OF COMPANY'S PLAN:

Comments: A critical issue involves getting training to appropriate staff who supervise or conduct field operations (foresters and road maintenance personnel). WI DNR can not mandate specific training programs, but counties wishing to participate in the SFI program must meet the requirements for training. Formal training sessions are very important, and encouraged, but informal training (on-the-job) may be substituted on a limited basis provided it is documented.

STATUS: Approved

AUDITOR/DATE: Mike Ferrucci, 12/03/04

AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:

Comments: Confirmed implementation of training in all four counties visited in Surveillance Audit visit. FISTA (SFI SIC approved) BMP training sessions were sponsored by WI DNR throughout the state, and attended by all field foresters as needed. Also confirmed that BMPs use is listed in timber sale contracts and in the management plans. Training requirements have changed in current 2005-2009 Sustainable Forestry Initiative Standard®.

STATUS: CLOSED

AUDITOR/DATE: Michael Ferrucci, 02-09-06

LEGEND: OPEN=CA Plan Accepted **CLOSED**=CA implemented, verified & accepted **REJECTED**=CA Plan or Implementation rejected

Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR County Forest Program</u> Auditor: <u>Mike Ferrucci, NSF-ISR</u> Location of Finding: _____ Discussed with: <u>Jeff Barkley, County Forestry Specialist</u>	Date: <u>October 5, 2004</u> FRS # 1Y943 Finding Number: <u>CA-2004-4</u> CAR Number: <u>CA-2004-4</u> Previous CAR Number/Date: _____
<p>AUDITOR FINDING: Standard Number and Clause: <u>2002-2004 SFIS: 4.1.3.1.4 CI 2 BMP training sessions for employees are required and documented and similar sessions are encouraged and documented for contractors.</u> BMP training is not documented for contractors, although this information is available from FISTA. Training records for county field staff vary widely in their comprehensiveness. All WI DNR staff have training records maintained, although there are some gaps in computerized versions of these records, particularly for BMP training sessions held during the mid 1990s. Training sessions for BMPs for county employees are not always recorded.</p>	
Major Nonconformity _____ <u>Minor Nonconformity</u>	
Company Representative's Signature: <u>Note: Signed copy on file at NSF</u>	
<p>IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:</p> <p>1) ROOT CAUSE ANALYSIS BY COMPANY – Include potential causes and assurance that problem does not exist in other areas.</p> <p>Use of trained contractors has long been encouraged, but not always documented. The Forest Industry Safety Training Alliance (FISTA) maintains a database of training received by logging contractors. A listing of logging contractors that have attained “Master Logger Certification” is also maintained by the Wisconsin Professional Loggers Association (WPLA). Documentation of training for County Forest staff is not part of the DNR oversight required by statute.</p>	
<p>2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.</p> <p>a) <u>By Dec. 31, 2005, recommended language for inclusion into a County Forest’s prospectus will be developed that encourages trained contractors.</u></p> <p>b) <u>By July 2005, a section in the County Forest Plan template will be added that addresses the importance of training and the maintenance of training records for County Forest staff. The format of the training records will be left to the individual counties discretion but will include the participant name, course name, date, and location of the training *See also CA-2004-3. Training records for DNR staff will continue to be included in the present automated DNR system.</u></p>	
<p>3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.</p> <p>The WDNR will include an assessment of the training and training records for County Forest staff as part of the internal SFI monitoring that will be built into the regular County Forest audits (scheduled every 3 years) as well as at the annual County Forest / DNR partnership meeting. This will be completed by July of 2006.</p>	
Company Representative's Signature: <u>Note: Signed copy on file at NSF</u> _____ Date: _____	
<p>AUDITOR REVIEW OF COMPANY’S PLAN:</p> <p>Comments: These actions will serve to close this CAR. Changes in the new 2005-2009 SFI Standard® are likely to require mandatory training for contractors, not merely “encouraging” training, although such training requirements will be located in a different portion of the standard.</p>	

STATUS: ApprovedAUDITOR/DATE: Mike Ferrucci, 12/06/04**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**

Comments: Confirmed implementation of training and implementation of record-keeping systems in all four counties visited in Surveillance Audit visit. FISTA (SFI SIC approved) BMP training sessions were sponsored by WI DNR throughout the state, and attended by all field foresters as needed. Also confirmed that BMPs use is listed in timber sale contracts and in the management plans. Training requirements have changed in current 2005-2009 Sustainable Forestry Initiative Standard®.

STATUS: CLOSEDAUDITOR/DATE: Michael Ferrucci, 02-09-06

LEGEND: OPEN=CA Plan Accepted **CLOSED**=CA implemented, verified & accepted **REJECTED**=CA Plan or Implementation rejected

APPENDIX V



SFI Surveillance Audit Summary for Public Disclosure

The SFI Program of the Wisconsin County Forest Program has demonstrated continuing conformance with the Sustainable Forestry Initiative Standard ®, 2005-2009 Edition (SFIS), according to the NSF-ISR SFIS Certification Audit Process.

NSF-ISR initially certified Wisconsin County Forest Program to the SFIS on December 10, 2004. This report describes the first annual follow-up Surveillance Audit designed to focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. In addition, a subset of SFI requirements were selected for detailed review.

Wisconsin County Forest Program includes 2.3 million acres of forestland managed by 29 counties in the central and northern portions of Wisconsin. The scope of the SFIS Certification encompasses sustainable forestry activities of participating counties within the Wisconsin County Forest System and land management operations in selected Wisconsin County Forests including 25 counties encompassing approximately 2,180,384 acres of publicly owned forests, including the following counties:

Ashland, Barron, Bayfield, Burnett, Douglas, Eau Claire , Florence , Forest , Iron, Jackson , Juneau , Langlade, Lincoln , Marathon , Marinette, Oconto, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn, Wood

Responsibility for management of these forests rests with elected county boards, with management activities implemented by county-employed foresters supported by DNR personnel. The forests are managed to provide revenue, habitat, recreational opportunities, and to protect biodiversity values and special sites. The lands abound with a variety of game and non-game wildlife species, and attract a variety of recreationists from hunters to trail users to nature enthusiasts. The most common tree species in order are aspen, sugar maple, red maple, red oak, red pine, basswood, and white birch. Harvest levels over the past decade have averaged over 12 million board feet and 660,000 cords.

The Wisconsin County Forest's SFI Program is managed by Jeffrey Barkley, County Forests Specialist. A County Forest Certification Committee comprised of representatives of the counties, the Wisconsin County Forest Association, and DNR staff help implement the SFI program, reviewing progress and making suggestions for improvements or changes as needed.

The surveillance audit was performed by NSF-ISR on February 6-9 by an audit team including Lead Auditor Mike Ferrucci and Audit Team Member Dave Wager, Forest Ecologist. Auditors fulfill the qualification criteria for conducting SFIS Certification Audits contained in the

Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ). The objective of the audit was to assess continuing conformance of the organization's SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 Edition.

The objective of the SFIS audit was to assess continuing conformance of the firm's SFI Program to the requirements of the Sustainable Forestry Initiative Standard, 2005-2009 Edition with an emphasis on the new or revised SFI requirements. Forest practices that were the focus of field inspections included those that have been conducted since the previous field audit conducted in the fall of 2004. In addition, a subset of SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were reexamined during the audit.

The requirements of the 2005-2009 Sustainable Forestry Initiative Standard were used in the audit; no indicators were modified. As with the initial certification the scope included timberland only, as the Wisconsin County Forest Program's SFI programs do not include procurement operations. Several of the SFI Performance Measures were outside of the scope of the county programs and were excluded from the scope of the SFI Certification Audit as follows:

- Indicator 2.1.3 Plantings of exotic tree species
- Indicator 3.2.5 Riparian experts consulted where guidelines do not exist
- Objective 8 – Procurement Requirements

SFIS Surveillance Audit Process

The review was governed by a detailed audit protocol designed to enable the audit team determine conformance with the applicable SFI requirements. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. Documents describing these activities were provided to the auditor in advance, and a sample of the available audit evidence was designated by the auditor for review.

The possible findings for specific SFI requirements included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS. Surveillance Audits generally focus on conformance issues and do not generally address exceptional practices.

Overview of Audit Findings

Wisconsin County Forest Program's SFI Program was found to be in [substantial OR full conformance] with the SFIS Standard. The NSF-ISR Audit team reviewed all previous minor non-conformances and corrective action plans implemented by Wisconsin County Forest Program as follows:

1. Clear statements of commitment to implement the SFI requirements have been included in 15-Year County Forest Management Plans and communicated effectively
2. New methods have been implemented to assure that hardwood management standards are consistently implemented
3. Training gaps for foresters and loggers were resolved, initially through the encouragement of training for loggers (this requirement has since been changed) and by

ensuring that BMP training was provided to all foresters and other personnel as appropriate.

4. Training records have been updated, and record-keeping methods improved.

The NSF-ISR SFI Certification Audit Process determined that there was one new minor non-conformance:

1. The SFI Standard now requires appropriate training for contractors. While the vast majority of loggers working on these forests have received appropriate FISTA training offered through the Forest Industry & Safety Training Alliance (FISTA), requirements for such training have not been implemented in all participating counties.

The Wisconsin County Forest Program has developed plans to address these new issues. Progress in implementing the remaining open corrective action plans will be reviewed in subsequent surveillance audits.

Five opportunities for improvement were also identified. These findings do not indicate a current deficiency, but served to alert Wisconsin County Forest Program to areas that could be strengthened or which could merit future attention. These include efforts to improve inventory timeliness, to better define rutting and compaction issues, to apply silvicultural guidelines, to apply guidelines for stand level retention (e.g. coarse woody debris, den trees, snags), and to review programs (internal audits).

Wisconsin County Forest Program has also improved its SFI program by ongoing updates to the County Forest Management Plans (in process), by increasing emphasis on forest certification in training and information activities, and by clarifying several certification-related procedures in manual codes to ensure consistency of practices.

The next surveillance audit is scheduled for August 2007.

For More Information Contact:

Jeffrey Barkley, County Forests Specialist
Wisconsin DNR – Forestry Division
101 S Webster Street - FR/4
Madison WI 53703
jeffrey.barkley@dnr.state.wi.us
608-264-9217

or

Mike Ferrucci, SFI Program Manager
NSF-International Strategic Registrations
789 N. Dixboro Rd
Ann Arbor, MI 48105
203-887-9248 (Corporate Office Phone 1-888-NSF-9000)
<http://www.nsf-isr.org>

APPENDIX VI



Audit Matrix